

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)
V.) Case no. 1:14-CR-306 GBL-8
MANUEL E. PAIZ GUEVARA)

**MOTION FOR CERTIFIED SPANISH SPEAKING DEFENSE INTERPRETER
AT TRIAL**

MOTION SUMMARY

The defendant, Manuel E. Paiz Guevara, moves for a defense interpreter to assist the defense during trial. The request is made pursuant to the Sixth Amendment of the United States Constitution and Rule 43, F. R. Crim. P. Defendant is unable to speak or understand the English language and is unable to communicate with defense counsel during the trial. The defendant is being denied effective assistance of counsel.

MOTION

COMES NOW, MANUEL E. PAIZ GUEVARA, hereinafter referred to as defendant, and moves for a Spanish interpreter to be present and assist the defendant

during trial, to interpret questions and answers posed by counsel or the defendant during the course of the trial.

In support of the motion the defendant would allege and prove the following:

1. The defendant has been designated an indigent defendant.
2. That the defendant is without funds to secure the services of an interpreter at trial.
3. That the defendant enjoys the right to counsel and the right to communicate with his attorneys in a private and secure manner.
4. That the defendant is unable to communicate with or to aid his counsel during the trial.
5. That the defendant enjoys a right to be present during the presentation of evidence and at all other aspects of trial pursuant to the Sixth Amendment of the United States Constitution and Rule 43 of the F. R. Crim. P.

WHEREFORE, premises considered, defendant moves for the services of a court certified Spanish interpreter at court expense and that such interpreter be an adjunct of defendant's counsel, subject to the rules concerning the divulging of communications between counsel and defendant.

The court certified Spanish interpreter is to be available during all aspects of defendant's trial and at any time, during the course of the trial, when counsel and defendant have need to converse.

Respectfully submitted,

MANUEL E. PAIZ GUEVARA

By: _____/S/_____

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion for Designation of Law Enforcement Agencies was duly served, November 17, 2015, upon:

Stephen M. Campbell, Esq.
Julia K Martinez, Esq.
Assistant United States Attorneys
Eastern District of Virginia
2100 Jamison Avenue
Alexandria, Virginia 22314,

And all other defendants in this matter by the Court's electronic filing system.

/s/ David P. Baugh

David P. Baugh